



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 15 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Hubert R. and Sharon O. Thompson
ABC Trucking, Inc.
6104 Dinosaur Court
Imperial, Missouri 63052-2299

RE: Carter Carburetor Site, 2840 N. Spring Avenue,
St. Louis, Missouri

Dear Mr. and Mrs. Thompson:

The United States Environmental Protection Agency (EPA) is seeking information regarding the former Carter Carburetor property at 2840 N. Spring Avenue, in St. Louis, Missouri.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §9604(e), EPA requests that you respond to the Information Request enclosed with this letter.

Compliance with the Information Request set forth in Enclosure B is mandatory. Failure to respond fully and truthfully to the Information Request within the time period stated below could result in enforcement action by EPA, including the imposition of penalties, pursuant to Section 104 of CERCLA, as amended. Please be advised that provision of false, fictitious, or fraudulent statements or representations may subject the respondent to criminal penalties under 18 U.S.C. Section 1001.

Response to this Information Request should be made within thirty (30) calendar days of receipt of this letter. Instructions and Definitions are included as Enclosure A. This response should be directed to:

Mr. Victor Lyke
U.S. Environmental Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101



S00072988
SUPERFUND RECORDS

EPA strongly encourages you to give this matter your immediate attention and respond within the time specified above. If you have any questions relating to this Information Request, you may consult with EPA. Please direct technical questions to Mr. Lyke, at (913) 551-7256. Questions of a legal nature should be directed to Ms. Jennifer G. MacDonald, Assistant Regional Counsel, at (913) 551-7843.

Sincerely,

Robert L. Morby, Chief
Superfund Branch
Waste Management Division

Enclosures A and B

cc: Ed Knight
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Enclosure A

Instructions

1. Provide a separate narrative response to each and every question and subpart of a question set forth in this Information Request.
2. Precede each answer with the number of the question to which it corresponds.
3. The scope of this Information Request covers all information in your possession, custody and control, including information in the possession of your officers, employees, agents, servants, representatives, your attorneys, or other persons directly or indirectly employed or retained by you, or anyone else acting on your behalf or otherwise subject to your control, and any merged, consolidated, or acquired predecessor or successor, parent, subsidiary, division, or affiliate.
4. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
5. Whenever a full and complete answer to any question is contained in a document, the document may be supplied in place of a written answer provided that the specific sections or pages from the document that are responsive to the question are identified. For each document produced in response to this Information Request, indicate on the document or in some other reasonable manner, the number of the question to which it responds.
6. If any question cannot be answered fully, as full an answer as possible should be provided. State the reason for the inability to answer fully, and give any information, knowledge, or belief which you have regarding the unanswered portion.
7. Where anything has been deleted from a document produced in response to this Information Request:
 - a. specify the nature of the material deleted;
 - b. specify the reason for the deletion; and,
 - c. identify the person responsible for the deletion.
8. The information requested herein must be provided even though you may contend that it includes confidential business information. You may, if you desire, assert a confidentiality claim

covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F); Section 3007(b) of RCRA, 42 U.S.C. § 6927(b); and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret", or "proprietary" or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in the above-cited statutes and regulation. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above-cited statutes and regulation carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Definitions

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260 through 280, in which case the statutory or regulatory definitions shall apply. Unless otherwise indicated, the following definitions shall apply to the following terms as they are used in this Information Request.

1. The term **"you"** or **"respondent"** shall mean the company, governmental unit, or individual to whom this information request was directed, its officers, managers, employees, contractors, trustees, current and/or former partners, successors, assigns and agents.

2. The term **"person"** shall have the same definition as in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

3. The term **"site"** shall refer to the property known as the Carter Carburetor building and surrounding lot, located at 2840 N. Spring Avenue, St. Louis, Missouri. The site shall include all areas contaminated by the migration of a hazardous substance, pollutant or contaminant.

4. The term **"identify"** means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and telephone number, and present or last known job title, position, business, occupation or employer and, in the case of directors, officers, supervisors, managers, employees and agents, the term of the persons association or employment with respondent.

5. The term **"identify"** means, with respect to a corporation, partnership, business, trust or other association or business

entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization and a brief description of this business.

6. The term **"identify"** means, with respect to a document, to provide its customary business description, its date, its number, if any (e.g., invoice or purchase order number), the identity of the author, addressor, addressee and recipient, and the substance or the subject matter of the document.

7. The term **"document"** shall mean any object that records, stores or presents information and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.

8. The term **"hazardous substance"** shall have the same definition as that contained in Section 101(14) of CERCLA and includes any mixtures of such hazardous substances with any other substances, including petroleum products.

9. The term **"hazardous waste"** shall have the same definition as that contained in Section 1004(5) of RCRA.

10. The term **"materials"** shall mean all substances that have been generated, treated, stored, transported or disposed of or otherwise handled by respondent, including, but not limited to, all hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes as defined above.

11. The terms **"and"** and **"or"** shall be construed either disjunctively or conjunctively as necessary to bring within the

scope of this Information Request any information which might otherwise be construed to be outside its scope.

12. Words in the masculine shall be construed in the feminine and vice versa, and words in the singular shall be construed in the plural and vice versa, where appropriate in the context of a particular question.

Enclosure B

First Information Request

1. Provide the name, address, and telephone number of the person to responding to this Information Request.
2. For each and every question, identify all persons consulted in the preparation of the response.
3. For each and every question, identify all documents consulted, examined, or referred to in the preparation of the response, or that contain information responsive to the question. Provide true and accurate copies of all such documents.
4. List EPA RCRA identification numbers of the respondent and identify the corresponding units, facilities or vessels to which these numbers are assigned.
5. Describe the acts or omissions of any persons that may have caused the release or threat of release of hazardous substances at the site.
6. Identify all persons who have knowledge, information or documents about the generation, use, purchase, treatment, storage, disposal or other handling of materials at or transportation of materials to the site.
7. Provide a detailed description of all transactions relating to the transfer of the former Carter Carburetor property to and from you. Provide copies of all documents pertaining to these transactions. Include in your response: (a) the name and address of the person from/to whom such property interest was conveyed; (b) the date of the conveyance; (c) the fair market value of such property interest on the date of the conveyance; and, (d) in the case of your conveyance to another person, the consideration or payment received by you from the recipient of such conveyance.
8. Describe the nature of the business conducted at the Carter Carburetor facility, by you, and by previous and subsequent operators of the property, including but not limited to dates of operation.
9. Describe the relationship between respondent and the previous and former owners and operators of the site.
10. Describe the relationship between you, Mr. Elmer Dillard, W.A. Beck, and Mr. and Mrs. Edward Pivirotto and provide a current address for each.
11. Regarding the hazardous materials transported to, stored,

treated or disposed of at the site, provide the following:

- a. Descriptions and quantities of any hazardous materials transported to, stored, treated or disposed of at the site.
- b. Maps, sketches, drawings, photographs or other graphical means of identifying the location of any hazardous materials at the site.
- c. A detailed description of how the oil drained from oil filled electrical equipment was handled, including how it was drained, stored, reused, and/or disposed of.

12. Provide copies of all lists, ledgers, or other records identifying oil-filled electrical equipment transported to, stored, treated or disposed of at the site, including but not limited to, oil filled electrical equipment that was cleaned and recertified for future use. Provide copies of invoices and all analytical data for the equipment identified.

13. Describe the physical characteristics of the site, including but not limited to the following:

- a. Surface structures (e.g., buildings, tanks, etc.).
- b. Groundwater wells, including drilling logs.
- c. Past and present storm water drainage system, and sanitary sewer system, including septic tank and subsurface disposal field.
- d. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the site, or to the property itself (e.g. excavation work) and state the dates on which such changes occurred.

14. For each and every current and prior owner, operator, lessor or lessee of any portion of the site:

- a. Identify such person and the nature of their operation at the site.
- b. Describe the portion of the site owned, operated, or leased by each such person and state the dates during which each portion was owned, operated or leased.
- c. Provide copies of all documents evidencing or relating to such ownership operation or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.
- d. Provide all evidence that hazardous materials were released or threatened to be released at the site.

15. Provide all existing technical or analytical information about the site, including but not limited to data and documents related to soil, water (ground and surface), geology, geohydrology, or air quality on or about the site, including but not limited to any documents required by or submitted to Federal, State or Local government agencies.

16. Do you know or have reason to know of any on-going or planned investigations of the soil, water, (ground and surface), geology, hydrogeology, or air quality on or about the site? If so:

- a. Describe the nature and scope of these investigations;
- b. Identify the persons who are undertaking or will undertake these investigations;
- c. Describe the purpose of the investigations;
- d. State the dates of such investigations;
- e. Describe as precisely as possible the locations at the site where such investigations are taking or will take place.

17. Describe all leaks, spills or releases or threats of releases of any kind into the environment of any hazardous materials, including but not limited to oil from oil filled electrical equipment, that have occurred or may occur at the site. Provide at least the following in your response:

- a. When such releases occurred or may occur.
- b. How the releases occurred or may occur.
- c. What hazardous materials were released or may be released.
- d. What amount of each such hazardous material was so released.
- e. Where such releases occurred or may occur.
- f. Any and all activities undertaken in response to each such release or threatened release.
- g. Any and all investigations of the circumstances, nature, extent or location of each such release or threatened release including, the results of any soil, water (ground or surface), or air testing that was undertaken.
- h. All persons with information relating to subparts a. through g. of this question.

18. If any release or threatened release identified in the preceding question occurred into any subsurface disposal system or floor drain inside or under any buildings located on the site, further identify:

- a. Where precisely the disposal system or floor drains are and were located.
- b. When the disposal system or floor drains were installed.
- c. Whether the disposal system or floor drains were connected to pipes, and if so, the purpose of such pipes.
- d. Where such pipes are or were located.
- e. When such pipes were installed.
- f. How and when such pipes were replaced, repaired, or otherwise changed.

19. Identify all persons, including you, who may have manufactured, given, sold, transferred, delivered, or otherwise handled, all electrical equipment, including transformers, switch gears and capacitors. In addition:

- a. Describe in complete detail all arrangements pursuant to which such persons may have so handled such items or materials.
- b. State the dates on which such persons may have handled each such items or materials.
- c. State the amounts of such items or materials that may have been so handled on each such date.
- d. Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of such items or materials.
- e. Describe all tests, analyses, and results of such tests and analyses concerning such items or materials.
- f. Identify the persons to whom such items or materials may have been given, sold, transferred or delivered.
- g. Provide copies of all documents (including but not limited to invoices, receipts, manifests, shipping papers, customer lists and contracts) which may reflect, show or evidence the giving, sale, transfer or delivery, or other arrangements under which the giving, sale, transfer, or delivery of any items or materials to or from the site took place.

- h. Describe the type, condition, number, and all markings on the containers in which the items or materials were contained when they were handled.
20. Identify the parent corporation and all subsidiaries of respondent, if any.
21. Provide a copy of the most current Articles of Incorporation and By-laws of respondent.
22. Identify the officers, managers, and majority shareholders of respondent and the nature of their management duties and amount of shares held, respectively.
23. Provide a list of all property and casualty insurance policies (e.g. Comprehensive General Liability, Environmental Impairment Liability, and Automobile Liability policies) as well as Director and Officer liability policies and indemnity contracts for the period during which respondent had an interest in the site property. Specify the insurer, policy number, effective dates, and per occurrence limits for each policy. Copies of policies may be provided in lieu of a narrative response.
24. Provide copies of all financial documents, including income tax returns sent by you to the Federal Internal Revenue Service in the last five years.
25. Provide copies of financial statements, reports, or projections prepared by, for or on behalf of the respondent for the past five years, whether audited or unaudited, including, but not limited to, all those filed with the Securities and Exchange Commission, State agencies, and all financial institutions.
26. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
27. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 15 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Hubert R. and Sharon O. Thompson
ABC Trucking, Inc.
6104 Dinosaur Court
Imperial, Missouri 63052-2299

RE: Carter Carburetor Site, 2840 N. Spring Avenue,
St. Louis, Missouri

Dear Mr. and Mrs. Thompson:

The United States Environmental Protection Agency (EPA) is seeking information regarding the former Carter Carburetor property at 2840 N. Spring Avenue, in St. Louis, Missouri.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §9604(e), EPA requests that you respond to the Information Request enclosed with this letter.

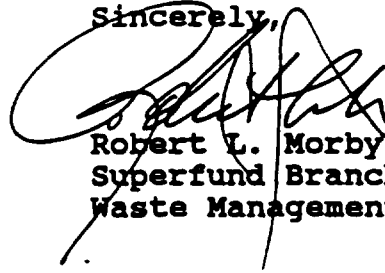
Compliance with the Information Request set forth in Enclosure B is mandatory. Failure to respond fully and truthfully to the Information Request within the time period stated below could result in enforcement action by EPA, including the imposition of penalties, pursuant to Section 104 of CERCLA, as amended. Please be advised that provision of false, fictitious, or fraudulent statements or representations may subject the respondent to criminal penalties under 18 U.S.C. Section 1001.

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Mr. Victor Lyke
U.S. Environmental Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

EPA strongly encourages you to give this matter your immediate attention and respond within the time specified above. If you have any questions relating to this Information Request, you may consult with EPA. Please direct technical questions to Mr. Lyke, at (913) 551-7256. Questions of a legal nature should be directed to Ms. Jennifer G. MacDonald, Assistant Regional Counsel, at (913) 551-7843.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Morby", is written over the word "Sincerely," and extends down over the typed name.

Robert L. Morby, Chief
Superfund Branch
Waste Management Division

Enclosures A and B

cc: Ed Knight
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102